

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

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**Alicia BELTRAN**

**Applicant,**

**vs.**

**Jamie LOEHNIS, in his official capacity as  
Executive Director of the Casa Clare  
Treatment Center; Jim STRACHOTA,  
in his official capacity as Director of Human  
Services for Washington County, WI;  
Mark D. BENSEN, in his official capacity as  
District Attorney for Washington County,  
WI; the WASHINGTON COUNTY  
CIRCUIT COURT; and John DOE, in his  
official capacity as immediate custodian  
of Applicant Alicia Beltran,**

**Respondents.**

**Docket No.** \_\_\_\_\_

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**MOTION TO SEAL PART OF EXHIBIT APPENDIX PURSUANT TO EASTERN  
DISTRICT OF WISCONSIN GENERAL LOCAL RULE 79(d)**

Comes now Applicant Alicia Beltran and moves this Honorable Court to place under seal identifying personal information, including residential addresses, in the following documents in the Exhibit Appendix pursuant to Eastern District of Wisconsin General Local Rule 79(d):

- i. Petitioner's Application for Writ of Habeas Corpus
- ii. the Affidavit of Alicia Beltran
- iii. the Affidavit of Sonia Fritsche.

Contemporaneous with this Motion, Applicant Alicia Beltran has filed an Application for Writ of Habeas Corpus Pursuant to 28 U.S.C. § 2241 by a Person in Custody and a Motion for Temporary Restraining Order and Preliminary and Permanent Injunction.

For reasons explained more completely in Applicant's attached Memorandum of Law, the risk to Applicant of identity theft and harassment or abuse if personal identifying information remains unsealed outweighs the right of the public to access documents filed with the Court. Applicant does not request to seal the identifying information from parties to the case, only from the public. In accordance with the Committee Comment to Local Rule 79, Ms. Beltran limits this motion to the "portion of the material necessary to protect the movant from the harm that may result from disclosure," and will submit a redacted version of the applicable documents along with this request to seal the confidential information in certain portions of the Exhibit Index.

Dated: September 27, 2013

Respectfully submitted,

s/ Linda S. Vanden Heuvel  
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- *for* -

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*Counsel for Petitioner*

\*Admission to the federal district court for the Eastern District of Wisconsin pending.

